

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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**NINTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES  
FOR PULMAN LEFLORE PULLEN & REED, LLP, AS COUNSEL TO THE TRUSTEE  
FOR THE TIME PERIOD OF DECEMBER 1, 2024 TO APRIL 30, 2025**

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**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD. ANY RESPONSE MUST BE TIMELY FILED WITH THE UNITED STATES BANKRUPTCY CLERK, WESTERN DISTRICT OF TEXAS, 615 E. HOUSTON ST., ROOM 597, SAN ANTONIO, TEXAS 78205.**

**IF A TIMELY RESPONSE IS FILED, THE COURT WILL THEN SET A HEARING ON THE MOTION, AND YOU WILL BE PROVIDED WITH NOTICE OF THE DATE, TIME, AND PLACE OF THE HEARING. IF YOU DO NOT ATTEND THE HEARING, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE MOTION.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.**

Name of Applicant:		Randall A. Pulman Pulman LeFlore Pullen & Reed LLP
Applicant's professional role in case		Counsel for the Chapter 7 Trustee
Indicate whether this is an interim or final application		Interim
Date Order of Appointment filed		01/20/2022 [ECF No. 48]
Effective Date of Appointment		12/20/2021
	Beginning of Period	Ending of Period

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<sup>1</sup> The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a "**Bankruptcy Estate**" and collectively, "**Bankruptcy Estates**".

Total period covered in application	12/01/2024	04/30/2025
Time periods covered by any prior applications	12/15/2021	11/30/2024
Total fees awarded in all prior applications		\$1,388,301.50
Total reimbursable expenses awarded in all prior applications		\$91,665.71
Amount of retainer received in the case		\$0.00
Total amount of credits applied by PLP&R to fees in all prior applications		\$38,320.00
Total fees applied for in the Ninth Fee Application and in all prior applications (including any retainer amounts or credits applied or to be applied)		\$1,456,560.50
Total fees applied for in the Ninth Fee Application (including any retainer amounts or credits to be applied)		\$68,259.00
Total professional hours covered by the Ninth Fee Application		198.3
Reimbursable expenses sought in the Ninth Fee Application		\$5,070.58
Application Cost		Approximately \$4,000.00
Total fees and reimbursable expenses sought in the Ninth Fee Application		\$73,329.58

TO THE HONORABLE MICHAEL M. PARKER, UNITED STATES BANKRUPTCY JUDGE:

Pulman LeFlore Pullen & Reed, LLP (“**PLP&R**”) (f/k/a Pulman, Cappuccio & Pullen, LLP), attorneys for John Patrick Lowe, Chapter 7 Trustee (“**Trustee**”) for the bankruptcy estates of deeproot Capital Management, LLC, Policy Services, Inc., Wizard Mode Media, LLC, deeproot Pinball LLC, deeproot Growth Runs Deep Fund, LLC, deeproot 575 Fund, LLC, deeproot 3 Year Bonus Income Debenture Fund, LLC, deeproot Bonus Growth 5 Year Debenture Fund, LLC, deeproot Tech LLC, deeproot Funds LLC, deeproot Studios LLC (each a “**Debtor**” and collectively, the “**Debtors**”), being jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523, hereby files this *Ninth Interim Application for Allowance of Hourly Legal Fees and Expenses for Pulman LeFlore Pullen & Reed, LLP, as Counsel to the Trustee for the Time Period of December 1, 2024 to April 30, 2025* (“**Ninth Fee Application**”), for allowance of compensation of \$68,259.00 in fees and reimbursement of expenses of \$5,070.58,

for a total of \$73,329.58, for the time period of December 1, 2024 to April 30, 2025. Included in the amount of the fees requested by this Ninth Fee Application, are those certain interim fees for legal services requested by PLP&R in its Third Fee Application [ECF No. 260] in the amount of \$14,759.00, which fees the Court ordered disallowed “without prejudice to Applicant in a subsequent application seeking recovery of the Redacted Time Entries.” See, *Order Granting in Part Third Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023*, [ECF No. 272], by which the Court ordered that the amount of the fees associated with redacted time entries found in the detailed time descriptions attached to the Third Fee Application (“**Redacted Time Entries**”) should be then disallowed as the Court was at that time unable to assess the reasonableness and necessity of the services performed. The Redacted Time Entries had been redacted by PLP&R at the time to avoid potential disclosures that could impair the Trustee’s litigation strategy. Attached hereto as Exhibit D-63 are unredacted versions of the previously Redacted Time Entries detailing the legal services provided by PLP&R.

In support of this Ninth Fee Application, PLP&R respectfully asks the Court to approve and authorize this Ninth Fee Application based on the following:

**I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Ninth Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue for this case is proper in the Western District of Texas under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. On December 9, 2021, (the “**Petition Date**”), the Debtors filed voluntary petitions under Chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy Code**”) [ECF No. 1]. The Court, by its Order entered December 21, 2021,

authorized that the Debtors' bankruptcy cases be jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523 (the "**Jointly Administered Case**") [ECF No. 20].

3. On or about December 21, 2021, John Patrick Lowe was duly appointed as Trustee.

4. The statutory predicates for the relief sought by this Ninth Fee Application are sections 328(a) and 331 of the Bankruptcy Code.

5. A copy of the proposed order in conformity with Local Rule 9013 is attached as Exhibit A.

6. A copy of the Notice and Summary of this Ninth Fee Application is attached as Exhibit B.

## **II. FACTUAL AND PROCEDURAL BACKGROUND**

7. The Debtors in this Jointly Administered Case are entities through which the Debtors' principal, Mr. Robert Mueller ("**Mueller**") ran a Ponzi scheme. Mueller controlled, as the sole owner, officer and director of each of the Debtors, all of their operations. Upon information and belief, Mueller raised, on behalf of the Debtors, in excess of \$70,000,000 from individual investors over the past decade.

8. Initially, Mueller raised monies from individual investors through Debtor, Policy Services, Inc. ("**PSI**"), by purportedly selling fractional interests in the death benefits payable on life insurance policies (the "**Policies**") purchased by PSI. These fractional interests in the Policies are known as life settlements. *See Life Partners, Inc. v. Arnold*, 464 S.W.3d 660, 662 (Tex. 2015).

9. In or around 2015, Mueller stopped raising investor money directly through PSI and began to raise investor money primarily, though not exclusively, through two of the other Debtors, deeproot Growth Runs Deep Fund, LLC, and deeproot 575 Fund, LLC (the "**Funds**").

After Mueller switched to raising monies through the Funds, the investment pitch varied over time, but essentially investors were promised a guaranteed annual return of 5% to 7% payable at the end of the applicable investment period. Investors purchased debentures—or long-term unsecured obligations—to pay. Mueller marketed the Funds as having investments in life settlements, agriculture, real estate, and sports and entertainment businesses. In 2017, invested monies, by way of intercompany transfers to deeproot Pinball, LLC, deeproot Studios, LLC, deeproot Tech, LLC, and Wizard Mode Media, LLC, were used to support Mueller’s ultimately unsuccessful effort to develop and manufacture state of the art pinball machines. The Debtors’ pre-petition financial statements and each of the Debtors’ respective schedules reflect that none of the Debtors generated any net income and, in most cases, had no revenue at any time. Despite the lack of revenue and net income, the Debtors did return investments to some of the investors.

10. On or about August 20, 2021, the United States Securities and Exchange Commission (the “SEC”) filed suit<sup>2</sup> against Debtors Policy Services, Inc. and deeproot Funds, LLC, and Mueller individually, for violations of federal securities law, and named Mueller’s immediate family members, Jeffery L. Mueller and Belinda B. Breen, as relief parties (the “SEC Civil Action”). An injunction was entered prohibiting the solicitation of additional funds. Shortly thereafter, on December 9, 2021, chapter 7 bankruptcy petitions were filed for each of the Debtors.

11. In or about November 2024, a federal grand jury in San Antonio, Texas indicted Mueller on eight counts of wire fraud.

12. On January 20, 2022, the Court entered its *Order on the Application of Trustee to Employ Counsel* (the “**Employment Order**”), wherein the Court authorized the Trustee to employ PLP&R as counsel [ECF No. 48]. The Employment Order permits PLP&R to seek interim

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<sup>2</sup> *Securities and Exchange Commission v. Robert J. Mueller, et al.*, Civil Action No. 5:21-cv-785, U.S. Dist. Ct. for the W. Dist. Of Texas, San Antonio Division.

compensation as provided in 11 U.S.C. §331, subject to approval by this Court. A copy of the Employment Order is attached hereto as Exhibit C.

13. On May 13, 2022, PLP&R filed its *First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, with the Court (“**First Fee Application**”). [ECF No. 111].

14. On June 9, 2022, the Court entered its *Order Granting First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, authorizing the Trustee to pay to PLP&R as an administrative expense, hourly fees in the amount of \$226,982.50 and expenses in the amount of \$28,952.54 from the Bankruptcy Estate accounts of the Debtors as designated in the Court’s Order. [ECF No. 125].

15. On October 31, 2022, PLP&R filed its *Second Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022*, with the Court (“**Second Fee Application**”). [ECF No. 189].

16. On December 6, 2022, the Court entered its *Order Granting Second Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022*, authorizing the Trustee to pay to PLP&R as an administrative expense, hourly fees in the amount of \$259,247.00 and expenses in the amount of \$6,145.75 from the Bankruptcy Estate accounts of the Debtors as designated in the Court’s Order. [ECF No. 211].

17. On March 3, 2023, PLP&R filed its *Third Interim Application for Allowance of*

*Legal Fees and Expenses for Pullman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023*, with the Court (“**Third Fee Application**”). [ECF No. 260].

18. On April 6, 2023, the Court entered its *Order Granting in Part Third Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023*, authorizing the Trustee to pay to PLP&R as an administrative expense, interim hourly fees in the amount of \$309,885.00 and expenses in the amount of \$29,860.29 from the Bankruptcy Estate accounts of the Debtors as designated in the Court’s Order. The Court ordered that the amount of the fees for redacted time entries found in the detailed time descriptions attached to the Third Fee Application (“**Redacted Time Entries**”) should be disallowed as the Court was then unable to assess the reasonableness and necessity of the services performed. The amount of the partial award of interim fees thus reflected PLP&R’s requested interim fees of \$324,644.00 less \$14,759.00, the amount of the Redacted Time Entries. The Court further ordered that its Order was without prejudice to PLP&R in a subsequent application seeking recovery of the Redacted Time Entries. [ECF No. 272].

19. On July 3, 2023, PLP&R filed its *Fourth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Periods of February 1, 2023 to May 31, 2023*, with the Court (“**Fourth Fee Application**”). [ECF No. 282].

20. On August 1, 2023, the Court entered its *Order Granting in Part Fourth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Periods of February 1, 2023 to May 31, 2023*, authorizing the

Trustee to pay to PLP&R as an administrative expense, interim hourly fees in the amount of \$231,544.50 and expenses in the amount of \$8,544.81 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. [ECF No. 286]. The Court ordered that the amount of the fees for certain time entries found in the detailed time descriptions attached to the Third Fee Application ("**Clerical Time Entries**"), should be disallowed. The amount of the partial award of interim fees thus reflected PLP&R's requested interim fees of \$232,556.50 less \$1,012.00, the amount of the Clerical Time Entries.

21. On November 3, 2023, PLP&R filed its *Fifth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Periods of June 1, 2023 to September 30, 2023*, with the Court ("**Fifth Fee Application**"). [ECF No. 306].

22. On November 28, 2023, the Court entered its *Order Granting Fifth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period June 1, 2023 to September 30, 2023*, authorizing the Trustee to pay PLP&R as an administrative expense, interim hourly fees in the amount of \$193,362.50 and all expenses in the amount of \$8,713.62 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. [ECF No. 309].

23. On March 4, 2024, PLP&R filed its *Sixth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2023 to January 31, 2024*, with the Court ("**Sixth Fee Application**"). [ECF No. 323].

24. On April 1, 2024, the Court entered its *Order Granting Sixth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to*



*the Trustee for the Time Period October 1, 2023 to January 31, 2024*, authorizing the Trustee to pay PLP&R as an administrative expense, interim hourly fees in the amount of \$63,745.00 and all expenses in the amount of \$3,484.87 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. [ECF No. 326].

25. On June 19, 2024, PLP&R filed its *Seventh Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of February 1, 2024 to May 31, 2024*, with the Court ("**Seventh Fee Application**"). [ECF No. 330].

26. On July 19, 2024, the Court entered its *Order Granting Seventh Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period February 1, 2024 to May 31, 2024*, authorizing the Trustee to pay PLP&R as an administrative expense, interim hourly fees in the amount of \$75,515.00 and all expenses in the amount of \$4,852.47 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. [ECF No. 332].

27. On December 31, 2024, PLP&R filed its *Eighth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of June 1, 2024 to November 30, 2024*, with the Court ("**Eighth Fee Application**"). [ECF No. 336].

28. On January 27, 2025, the Court entered its *Order Granting Eighth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of June 1, 2024, to November 30, 2024*, authorizing the Trustee to pay PLP&R as an administrative expense, interim hourly fees in the amount of \$28,020.00 and all expenses in the amount of \$1,111.36 from the Bankruptcy Estate accounts of

the Debtors as designated in the Court’s Order. [ECF No. 338].

### **III. APPLICATION FOR HOURLY SERVICES**

29. PLP&R has provided legal services and expended 198.3 hours from December 1, 2024, to April 30, 2025 (the “**Application Period**”), totaling \$73,329.58 in fees representing the Trustee. The average hourly rate for this Ninth Fee Application was \$370.00 per hour.

30. During the five-month Application Period, lawyers from PLP&R on behalf of the Trustee:

- a) Drafted a motion to substantively consolidate the eleven jointly administered bankruptcy cases;
- b) Drafted Trustee’s response/opposition to motion to abate the SEC Matter;
- c) Drafted and served discovery requests, drafted responses and objections to discovery requests, drafted motion for partial summary judgement, engaged in settlement negotiations, drafted settlement agreement and motion to approve compromise and settlement under Rule 9019, in connection with the Mark Zabinski adversary proceeding, recovering \$85,000.00 to the Bankruptcy Estate; and
- d) Drafted responses to discovery requests, conferred with opposing counsel regarding informal discovery, researched and responded to legal arguments raised in connection with the adversary action brought by Trustee against Carlile, Patchen & Murphy, LLP, a law firm that represented Debtor in connection with certain matters involving preparation and approval of Debtor’s private placement memoranda.

31. Below is a chart summarizing fees, expenses and hours expended in the Bankruptcy Case by PLP&R by matter number.

<b>PC&amp;P Matter No.</b>	<b>Matter Description</b>	<b>Debtor Estate</b>	<b>Fees</b>	<b>Expenses</b>	<b>Hours</b>
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$11,687.50	\$5,070.58	29.60
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$2,325.00	\$0.00	5.00

1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$0.00	\$0.00	0.00
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$24,470.00	\$0.00	64.50
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	Americian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$15,017.50	\$0.00	39.30
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.063	Redacted Time	Policy Services, Inc., Case No. 21-51513	\$14,759.00	\$0.00	59.90
	<b>Total:</b>		<b>\$68,259.00</b>	<b>\$5,070.58</b>	<b>198.30</b>

Attached hereto as Exhibit D-1 through D-63 are copies of billing invoices itemizing the fees and expenses incurred by PLP&R in each of the sixty-three matters, by date and billing category.

**A. Summary of Services Rendered in the Bankruptcy Case by Category**

PLP&R Matter Nos. 1934.001 – 1934.062

<b>Category</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
B160	Fee/Employment Applications	11.6	\$4,350.00
B190	Other Contested Matters (excluding assumption/rejection motions)	186.7	\$63,909.00
	<b>Total:</b>	198.3	\$68,259.00

**i. Fee/Employment Applications (B160)**

32. Services rendered in this category involved drafting the Eighth Fee Application, filed with the Court on December 31, 2024 [ECF No. 336], and this Ninth Fee Application.

33. PLP&R expended a total of 11.6 hours in the main bankruptcy case, which resulted in total charges of \$4,350.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibit D-1.

**ii. Other Contested Matters (excluding assumption/rejection motions) (B190)**

34. Services rendered in this category include the administration of adversary actions brought by lawyers with PLP&R on behalf of the Trustee, preparing and responding to discovery requests, drafting motions, and engaging in settlement discussions.

35. PLP&R expended a total of 186.7 hours, which resulted in total charges of \$63,909.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-63.

**B. Matters Relating to the SEC**

PLP&R Matter No. 1934.002 (Estate: deeproot Funds, LLC, Case No. 21-51521)

36. Services rendered by lawyers from PLP&R relating to the SEC and the SEC Case

(the “**SEC Matter**”) include drafting Trustee’s opposition to motion to abate, video and telephone conferences with SEC attorneys, telephone conferences with Trustee.

37. In connection with the SEC Matter, PLP&R expended a total of 5 hours, which resulted in total charges of \$2,325.00. The detailed time descriptions for this matter are included in Exhibit D-2.

**C. Matters Relating to Claim Against Mark Zabinski – Finder**  
PLP&R Matter No. 1934.026 (Estate: Policy Services, Inc.)

38. This matter (the “**Zabinski Matter**”) concerns an adversary proceeding brought by the Trustee against Mark Zabinski, one of the many individuals and companies who are referred to in Debtors’ records as finders (the “**Finders**”) to recover commissions paid by Debtor, Policy Services, Inc. The Finders are individuals and companies (primarily investment advisers or insurance agents/agencies) who contracted with Debtors to find individual investors willing to invest in one or more of the deeproot investment funds. The Finders received commissions from the Debtors based on the amount of funds invested by the individual investors in the deeproot Funds. These commissions constitute avoidable transfers recoverable by the Trustee under 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

39. During this Application Period, Lawyers from PLP&R prepared and responded to discovery requests, drafted a motion for partial summary judgment, engaged in settlement discussions, and ultimately settled the Zabinski Matter recovering \$85,000.00 to the Bankruptcy Estate.

40. In connection with the Zabinski Matter, PLP&R expended a total of 64.5 hours, which resulted in total charges of \$24,470.00. Detailed descriptions of these matters are included in Exhibit D-26.

**D. Matters Relating to Carlile, Patchen & Murphy, LLP**  
PLP&R Matter No. 1934.061 (Estate of Policy Services, Inc.)

41. This matter (the “**CPM Matter**”) concerns an adversary proceeding against Carlile, Patchen & Murphy, LLP (“**CPM**”), a law firm that represented Debtor in connection with certain matters involving preparation and approval of private placement memoranda concerning the Funds.

42. Services rendered by lawyers from PLP&R included communications with opposing counsel, responding to discovery, and responding to opposing counsels’ legal arguments.

43. In connection with the CPM Matter, PLP&R expended a total of 39.3 hours, which resulted in total charges of \$15,017.50. Detailed descriptions of these matters are included in Exhibit D-61.

**E. Matters Relating to the Redacted Time Entries (Third Fee Application)**  
PLP&R Matter No. 1934.063 (Estate of Policy Services, Inc.)

44. This matter (the “**Redacted Time Entries Matter**”) concerns services performed by lawyers from PLP&R related to the Redacted Time Entries found in the detailed time descriptions attached to the Third Fee Application.

45. The Redacted Time Entries were redacted by PLP&R at the time the Third Fee Application was filed with the Court to avoid potential disclosures that could impair the Trustee’s litigation strategy.

46. Services rendered by lawyers from PLP&R in the Redacted Time Entries Matter include litigation strategy meetings, the drafting of a motion for substantive consolidation, and related legal research.



47. Simultaneously with the filing of this Ninth Fee Application, PLP&R is filing the *Chapter 7 Trustee's Motion for Substantive Consolidation* of the eleven jointly administered bankruptcy cases.

48. In connection with the Redacted Time Entries Matter, PLP&R expended a total of 59.9 hours, which resulted in total charges of \$14,759.00. The detailed unredacted time entries describing the services rendered by lawyers from PLP&R are included in Exhibit D-63.

**F. Reimbursement of Expenses**

49. PLP&R also files this Ninth Fee Application seeking reimbursement of the reasonable out-of-pocket expenses incurred during the Application Period, in the amount of \$5,070.58. The total expenses incurred by matter are included on the chart found in paragraph 31 above. An itemization report of the expenses incurred by matter is provided in each of Exhibits D-1 through D-63. All expenses for which compensation is requested by PLP&R were incurred for and on behalf of the Trustee, and not on behalf of any committee, creditor, or other person.

**G. Allocation of Fees by Matter.**

50. Trustee's counsel has allocated the time expenses by the matters discussed above. For the most part, legal fees and expenses associated with a particular estate are allocated to that estate. For example, fees and expenses associated with adversary proceedings brought against Finders are allocated to the estate of Policy Services, Inc., as the monies received by Finders were paid from Policy Services' bank accounts; fees and expenses associated with adversary proceedings brought against Net Winners are allocated to the estate of deeproot Funds, LLC, as the monies received by Net Winners were paid from deeproot Funds, LLC's bank accounts; and fees and expenses related to general case administration matters are allocated to Policy Services, Inc.

51. This is the Ninth Fee Application for fees and expenses filed by PLP&R. This Ninth Fee Application requests approval of interim fees in the amount of \$68,259.00 and interim expenses in the amount of \$5,070.58, for a total allowed amount of \$73,329.58 in interim hourly fees and expenses.

#### **IV. Authorities and Argument**

52. The statutory predicates for the relief sought by this Ninth Fee Application are §§ 328(a) and 330 of the Bankruptcy Code.

53. Bankruptcy Code § 330(a) provides that in determining the amount of reasonable compensation to be awarded, a Court shall consider the nature, the extent, and the value of the services rendered by the professional, while taking into account the relevant factors, including the following:

- The time spent on such services;
- The rates charged for such services;
- Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered, toward the completion of the chapter 11 case;
- Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issues or task addressed;
- With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than chapter 11 cases.

11 U.S.C. § 330(a)(3). *See also Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 850 (3d Cir. 1994) (noting Bankruptcy Code's policy of providing adequate compensation and stating that "Congress rather clearly intended to provide sufficient economic incentive to lure competent bankruptcy specialists to practice in the bankruptcy courts.") (citation and internal quotation marks omitted).

*see also In re Woerner*, 783 F.3d 266, 274 (5th Cir. 2015) (“[Section 330] permits a court to compensate an attorney not only for activities that were ‘necessary,’ but also for good gambles—that is, services that were objectively reasonable at the time they were made—even when those gambles do not produce an ‘identifiable, tangible, and material benefit.’”) (citations and internal quotation marks omitted); *see also In re Pilgrim’s Pride Corp.*, 690 F.3d 650 (5th Cir. 2012) (reaffirming that bankruptcy courts have discretion to enhance professional fees in extraordinary cases).

54. The fees incurred by PLP&R in representing the Trustee were reasonable and necessary for the administration of the Bankruptcy Case. As reflected in the attached Exhibits D-1 through D-63, PLP&R has avoided unnecessary additional legal services and duplication of effort while striving to ensure the highest quality of legal representation.

55. The fees incurred by PLP&R were for reasonable and necessary legal work that does not fall within the scope of the Trustee’s administrative duties. *See In re: Sharon Sylvester*, 23 F.4th 543, 548 (5th Cir. 2022).

56. PLP&R performed these services within a reasonable period of time by professionals that have significant experience in bankruptcy cases. The rates charged by PLP&R for this matter are comparable to the rates charged by PLP&R in non-bankruptcy matters.

57. The PLP&R professionals who have worked on this case during the Application Period are:

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Ninth Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	14.1	\$7,050.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	5.9	\$2,655.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	143.2	\$53,700.00
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	5.0	\$1,375.00
Kerry Alleyne	Nov. 7, 2008	\$400.00	1.3	\$520.00
Guarav Mankotia	Sept. 27, 2008 Bar Council of	\$100.00	20.9	\$2,090.00

	Delhi, India			
Janell Thompson	Law Clerk	\$110.00	7.9	\$869.00
		<b>Total:</b>	198.3	\$68,259.00

PLP&R has met the requirements of § 330(a) of the Bankruptcy Code, and the Court should award the fees and expenses sought in this Eighth Fee Application.

58. The out-of-pocket expenses incurred by PLP&R have been billed only for expenses actually incurred by PLP&R. Accordingly, charges for expenses such as courier fees, filing fees, outside copy service, parking, travel, postage, meals, charges for public records and transcription services are billed at the actual cost to PLP&R. PLP&R is generally billed a flat monthly fee for legal research through Westlaw, and such charges are allocated based on actual usage to PLP&R's clients.

59. PLP&R submits that this Ninth Fee Application complies with §§ 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the United States Trustee Guidelines.

60. Detailed applications for compensation are required by the Bankruptcy Code, Local Rules, and applicable case law. This Ninth Fee Application has served the additional purpose of informing the Court and the creditors of the status of the case and the activities of the attorneys involved. The time spent preparing this Eighth Fee Application is compensable. *See* 11 U.S.C. § 330(a)(6).

61. The Trustee has reviewed this Ninth Fee Application and has approved the requested amounts and the allocation thereof.

**WHEREFORE**, PLP&R prays that upon consideration hereof, this Court enter an Order (i) approving PLP&R's request for interim fees in the amount of \$68,259.00 in fees and \$5,070.58 in related expenses, for a total of \$73,329.58, (ii) authorizing the Trustee to immediately pay

PLP&R from the appropriate Estate Account the allowed amount of \$73,329.58 for the fees and expenses that have been incurred to date, and (iii) granting such other and further relief as the Court finds appropriate to grant.

Dated: June 4 , 2025

Respectfully submitted,

**PULMAN LEFLORE PULLEN & REED, LLP**  
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**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY  
ADMINISTERED BANKRUPTCY ESTATES OF  
DEEPROOT CAPITAL MANAGEMENT, LLC,  
ET AL.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of June, 2025, I electronically filed the foregoing document using the CM/ECF system, which will serve the document on the following list of parties in interest and parties requesting notice. A copy of the notice/summary (Exhibit B) of this Ninth Interim Fee Application will be mailed via US First Class Mail to the parties on the limited-service list in this case, and a supplemental certificate of service will be filed to evidence compliance.

**Via Counsel CM/ECF:**

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deeproot Pinball, LLC

deeproot Growth Runs Deep Fund, LLC

deeproot 575 Fund, LLC

deeproot 3 Year Bonus Income Fund, LLC

deeproot BonusGrowth 5 Year Debenture Fund, LLC

deeproot Tech, LLC

deeproot Funds, LLC

deeproot Studios, LLC

deeproot Capital Management, LLC

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United States Trustee - SA12

US TRUSTEE'S OFFICE (Aubrey Thomas)

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SHANNON, MARTIN et al.

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Texas Workforce Commission

c/o Christopher S. Murphy

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/s/ Randall A. Pulman

Randall A. Pulman



# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

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**ORDER GRANTING  
NINTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES  
FOR PULMAN LEFLORE PULLEN & REED, LLP, AS COUNSEL TO THE TRUSTEE  
FOR THE TIME PERIOD OF DECEMBER 1, 2024 TO APRIL 30, 2025**

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Came on for consideration the *Ninth Interim Application for Allowance of Legal Fees and Expenses for Pulman LeFlore Pullen & Reed, LLP, as Counsel to the Trustee for the Time Period of December 1, 2024 to April 30, 2025* (“**Ninth Interim Application**”). The Court has considered the Ninth Interim Application and finds that the fees and expenses represent

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<sup>1</sup> The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

reasonable compensation for actual and necessary services, and reimbursement for actual, necessary expenses. After considering the pleadings, the Court also finds that (i) it has jurisdiction over the matters raised in the Ninth Interim Application pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) proper and adequate notice of the Ninth Interim Application has been given and that no other or further notice is necessary; (iv) all objections to the Ninth Interim Application have been resolved by this Order or are overruled in their entirety; and (v) upon the record herein after due deliberation thereon good and sufficient cause exists for the granting of the relief as set forth herein.

**IT IS THEREFORE ORDERED** that the Ninth Interim Application pursuant to 11 U.S.C. § 330 is hereby **GRANTED**;

**IT IS FURTHER ORDERED** that the fees in connection with the legal services described in the Ninth Interim Application are allowed. All interim fees in the amount of \$68,259.00 and all expenses in the amount of \$5,070.58, for the allowance of a total of \$73,329.58 in hourly fees and costs, shall be an administrative expense of the respective Bankruptcy Estates<sup>2</sup> as outlined in the Ninth Interim Application.

**IT IS FURTHER ORDERED** the Trustee is authorized to immediately pay PLP&R in connection with the hourly services provided, fees and expenses totaling \$73,329.58 from the specific Bankruptcy Estate accounts, as designated in the chart attached hereto as Exhibit 1.

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

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<sup>2</sup> Capitalized terms shall have the meaning ascribed to them in the Eighth Interim Application.

**Submitted by:**

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**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED  
BANKRUPTCY ESTATES OF DEEPROOT CAPITAL  
MANAGEMENT, LLC, *ET AL.***

## EXHIBIT 1

<b>PC&amp;P Matter No.</b>	<b>Matter Description</b>	<b>Debtor Estate</b>	<b>Fees</b>	<b>Expenses</b>	<b>Hours</b>
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$11,687.50	\$5,070.58	29.60
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$2,325.00	\$0.00	5.00
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$0.00	\$0.00	0.00
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00

1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$24,470.00	\$0.00	64.50
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	Amercian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$15,017.50	\$0.00	39.30
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.063	Redacted Time	Policy Services, Inc., Case No. 21-51513	\$14,759.00	\$0.00	59.90
	<b>Total:</b>		<b>\$68,259.00</b>	<b>\$5,070.58</b>	<b>198.30</b>

# **EXHIBIT B**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL., <sup>1</sup>	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

---

**NOTICE AND SUMMARY OF  
NINTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES  
FOR PULMAN LEFLORE PULLEN & REED, LLP, AS COUNSEL TO THE TRUSTEE  
FOR THE TIME PERIOD OF DECEMBER 1, 2024 TO APRIL 30, 2025**

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**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD. ANY RESPONSE MUST BE TIMELY FILED WITH THE UNITED STATES BANKRUPTCY CLERK, WESTERN DISTRICT OF TEXAS, 615 E. HOUSTON ST., ROOM 597, SAN ANTONIO, TEXAS 78205.**

**IF A TIMELY RESPONSE IS FILED, THE COURT WILL THEN SET A HEARING ON THE MOTION, AND YOU WILL BE PROVIDED WITH NOTICE OF THE DATE, TIME, AND PLACE OF THE HEARING. IF YOU DO NOT ATTEND THE HEARING, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE MOTION.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.**

- I. CLIENT: John Patrick Lowe, Chapter 7 Trustee
- II. REQUESTING APPLICATION / FIRM: Randall A. Pulman of Pulman LeFlore Pullen & Reed, LLP, (“**PLP&R**”) as counsel to the Trustee

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<sup>1</sup> The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

- III. TOTAL AMOUNT OF INTERIM FEES AND COSTS REQUESTED: \$73,329.58
- a. Fees: \$68,259.00
  - b. Expenses and Cost Advances (PLP&R): \$5,070.58
  - d. Time period covered: 12/01/2024 – 04/30/2025

IV. BREAKOUT OF CURRENT APPLICATION

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Ninth Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	14.1	\$7,050.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	5.9	\$2,655.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	143.2	\$53,700.00
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	5.0	\$1,375.00
Kerry Alleyne	Nov. 7, 2008	\$400.00	1.3	\$520.00
Guarav Mankotia	Sept. 27, 2008 Bar Council of Delhi, India	\$100.00	20.9	\$2,090.00
Janell Thompson	Law Clerk	\$110.00	7.9	\$869.00
		<b>Total:</b>	198.3	\$68,259.00

MINIMUM FEE INCREMENTS: 0.1 HOURS

EXPENSES: \$5,070.58 (Filing Fees, Photocopying and Postage associated with providing notices to creditors)

AMOUNT ALLOCATED FOR PREPARATION OF THIS FEE APPLICATION: \$4,000.00

- V. PRIOR APPLICATIONS: First Interim Fee Application, Second Interim Fee Application, Third Interim Fee Application, Fourth Interim Fee Application, Fifth Interim Fee Application, Sixth Interim Fee Application, Seventh Interim Fee Application, and Eighth Interim Fee Application.
- VI. OTHER CO-EQUAL OR ADMINISTRATIVE CLAIMANTS IN THIS CASE:
- a. John Patrick Lowe, Chapter 7 Trustee (“**Trustee**”).
- VII. RESULTS OBTAINED:

As reflected in the Ninth Interim Fee Application, PLP&R has provided legal services and has obtained favorable results for the Bankruptcy Estates in connection with the services provided to the Bankruptcy Estates. Among other things, PLP&R has: (1) Drafted a motion to substantively consolidate the eleven jointly administered bankruptcy cases; (2) Drafted Trustee’s response/opposition to motion to abate the SEC Matter; (3) Drafted and served discovery

requests, drafted responses and objections to discovery requests, drafted motion for partial summary judgement, engaged in settlement negotiations, drafted settlement agreement and motion to approve compromise and settlement under Rule 9019, in connection with the Mark Zabinski adversary proceeding, recovering \$85,000.00 to the Bankruptcy Estate; and (4) Drafted responses to discovery requests, conferred with opposing counsel regarding informal discovery, researched and responded to legal arguments raised in connection with the adversary action brought by Trustee against Carlile, Patchen & Murphy, LLP, a law firm that represented Debtor in connection with certain matters involving preparation and approval of Debtor's private placement memoranda.

Below is a chart summarizing fees, expenses and hours expended in the Bankruptcy Case by PLP&R by matter number.

<b>PC&amp;P Matter No.</b>	<b>Matter Description</b>	<b>Debtor Estate</b>	<b>Fees</b>	<b>Expenses</b>	<b>Hours</b>
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$11,687.50	\$5,070.58	29.60
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$2,325.00	\$0.00	5.00
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$0.00	\$0.00	0.00
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$24,470.00	\$0.00	64.50
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	American Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$15,017.50	\$0.00	39.30
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.063	Redacted Time	Policy Services, Inc., Case No. 21-51513	\$14,759.00	\$0.00	59.90
	<b>Total:</b>		<b>\$68,259.00</b>	<b>\$5,070.58</b>	<b>198.30</b>

Dated: June 4, 2025

Respectfully submitted,

**PULMAN LEFLORE PULLEN & REED, LLP**  
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By: /s/Randall A. Pulman  
Randall A. Pulman  
Texas State Bar No. 16393250  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)  
W. Drew Mallender  
Texas State Bar No. 24118450  
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**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE**

# EXHIBIT C



**IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.**

**Dated: January 20, 2022.**

A handwritten signature in black ink, appearing to read "Mike Parker".

**MICHAEL M. PARKER  
UNITED STATES BANKRUPTCY JUDGE**

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL.,	§	BANKRUPTCY No. 21-51523-MMP
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

---

**ORDER ON THE APPLICATION OF TRUSTEE FOR AUTHORITY TO EMPLOY COUNSEL**

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Came on for consideration the *Application of Trustee for Authority to Employ Counsel* (the “**Application**”)<sup>1</sup> filed by John Patrick Lowe, the Chapter 7 Trustee (the “**Trustee**”) for the captioned jointly administered chapter 7 case. Based on the representations made in the Application and in the supporting *Affidavit of Randall A. Pulman in Support of the Application of Trustee for Authority to Employ Counsel*, the Court finds that (i) it has jurisdiction over the matters raised in the Application pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding

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<sup>1</sup> Capitalized terms unless otherwise defined herein shall have the meaning as ascribed to them in the Application.



pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Application approving the employment of Pulman, Cappuccio & Pullen, LLP (“PC&P”) is in the best interest of the Estate and its creditors; (iv) PC&P holds no interest adverse to the Estate and is a disinterested person under 11 U.S.C. § 101(14); (v) proper and adequate notice of the Application has been given and no further notice is necessary; (vi) no objections to the Application have been filed; and (vii) based upon the record herein, after due deliberation, good and sufficient cause exists for the granting of the Application in all respects.

**IT IS, THEREFORE, ORDERED** that pursuant to section 327(a) of the Bankruptcy Code, the Trustee is authorized to employ PC&P with Randall A. Pulman to act as lead counsel to represent him as Trustee in this Case effective as of December 20, 2021, in accordance with the terms described in the Application, the engagement letter, and this Order, and to perform the services described below:

- a) to file pleadings with the court and to represent the Estate's interest in regard to any adversaries, appeals, or contested matters before this court and litigation in other courts, particularly with regard to the Estate's interest in various assets and the positions of secured and unsecured creditors, whether by motion, adversary action, turnover proceedings, or litigation activities of every description in other courts;
- b) to investigate, analyze, institute and prosecute actions regarding determination and recovery of property of the Estate, including investigation and prosecution of determination and lien perfection, avoidance litigation as well as collection and liquidation of assets of the Estate, to the extent such activities would be economically beneficial to the Estate;
- c) to assist the Trustee where necessary to negotiate and consummate non-routine sales or leases of the assets of the Estate, wherever they may be found, including sales free and clear of liens, claims and encumbrances, and to institute any necessary proceedings in regard thereto;
- d) to institute and prosecute non-routine objections to exemptions and non-routine objections to proofs of claim;
- e) to co-ordinate activities with the United States Trustee as appropriate in connection with issues of the integrity of the bankruptcy courts and procedures;

- f) to aid in the representation of the Trustee in any litigation against Trustee in Trustee's official capacity;
- g) to assist in resolution of sales of, and any title problems associated with, the Estate's property; and
- h) to collect any judgments that may be entered in favor of the Estate; and
- i) to assist in any other work requested by the Trustee.

**IT IS FURTHER ORDERED** that the Law Firm shall not be compensated by the bankruptcy Estate for performing duties required to be performed by the Trustee.

**IT IS FURTHER ORDERED** that if any supplemental declarations or affidavits are filed and served after entry of this Order, absent any objections within 21 days after the filing and service of such supplemental declarations or affidavits, PC&P's employment shall continue as authorized pursuant to this Order.

**IT IS FURTHER ORDERED** that PC&P shall be compensated upon appropriate application in accordance with Bankruptcy Code sections 330 and 331, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy of the Western District of Texas.

**IT IS FURTHER ORDERED** that the Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

**SUBMITTED BY:**

Randall A. Pulman  
Texas State Bar No. 16393250  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)

Anna K. MacFarlane  
Texas State Bar No. 24116701  
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(210) 892-1610 Facsimile

**PROPOSED ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED CASE  
OF IN RE DEEPROOT CAPITAL MANAGEMENT, LLC ET AL.**

# **EXHIBIT D-1**

**PULMAN LEFLORE PULLEN & REED LLP**

Attorneys &amp; Counselors

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Lowe, Pat (dprt)  
 Pat Lowe, Trustee  
 2402 E. Main St.  
 Uvalde, TX 78801

April 30, 2025

Invoice No. 267823  
 Account No. 1934.001

Page: 1

Deeproot - Policy Services, Inc. Case No. 21-51523, et al

Interim Statement

Fees

				Rate	Hours	
04/20/2024	WDM B160	A103	Draft/revise Sixth Interim Fee Application, proposed Order, and Notice and Summary.	375.00	4.40	1,650.00
12/04/2024	WDM B160	A103	Draft/revise 8th Interim Fee Application.	375.00	1.40	525.00
12/05/2024	WDM B160	A103	Draft 8th Interim Fee Application.	375.00	0.80	300.00
12/19/2024	WDM B160	A103	Draft 8th Interim Fee Application.	375.00	0.30	112.50
12/20/2024	WDM B160	A103	Review billing statements for accuracy and reasonableness; prepare spreadsheet of fees and expenses; draft 8th Interim Fee Application, Notice and Summary, and proposed Order.	375.00	4.10	1,537.50
12/23/2024	WDM B160	A103	Draft/revise 8th Interim Fee Application; email to Trustee for review and comment.	375.00	0.60	225.00
	RAP B190	A104	Review of 8th Fee Application; office conference with D. Mallender regarding same.	500.00	0.50	250.00
12/31/2024	RAP B190	A104	Final review and approval of 8th Fee Application.	500.00	0.50	250.00
03/06/2025	WDM B190	A103	Draft/revise motion to substantively consolidate cases. Update legal research. Email Pat Lowe with questions regarding			

Lowe, Pat (dprt)

Statement No. 267823

Account No 1934.001

Deeproot - Policy Services, Inc. Case No. 21-51523

Page: 2

				Rate	Hours	
			claims. Draft/revise proposed order.	375.00	4.80	1,800.00
03/12/2025	WDM B190	A103	Draft/revise Motion for Substantive Consolidation; prepare exhibits to same.	375.00	3.40	1,275.00
03/13/2025	WDM B190	A103	Draft/revise Motion for Substantive Consolidation	375.00	1.60	600.00
04/04/2025	RAP B190	A104	Review of e-mail from Tuyo's counsel regarding co-plaintiff in suit; forward same to Lowe.	500.00	0.50	250.00
04/08/2025	RAP B190	A109	Telephone conference with Jason McKinnie regarding TIC claim; review of documents; telephone conference with McKinnie and Lowe regarding same.	500.00	1.00	500.00
04/14/2025	RAP B190	A104	Review of amended petition and documents supporting TIC claim.	500.00	0.50	250.00
04/17/2025	RAP B190	A104	Review of e-mail from Tuyo counsel regarding co-plaintiff in suit; forward same to Lowe.	500.00	0.50	250.00
04/23/2025	RAP B190	A104	Review of e-mail from Tuyo's counsel regarding TIC claim; respond to same.	500.00	0.40	200.00
04/25/2025	RAP B190	A104	Review of e-mail from TuYo's counsel; telephone conference with Lowe regarding retention of special counsel.	500.00	0.50	250.00
04/28/2025	WDM B190	A103	Draft 9th Interim Fee Application, draft notice and summary.	375.00	3.00	1,125.00
04/29/2025	RAP B190	A109	Office conference with D. Mallender regarding preparation of Motion for Substantive Consolidation and Fee Application.	500.00	0.30	150.00
	WDM B190	A103	Office conference with Randall A. Pulman regarding Motion for Substantive Consolidation and Fee Application; Review Motion for Substantive			

Lowe, Pat (dprt)

Statement No. 267823

Account No 1934.001

Deeproot - Policy Services, Inc. Case No. 21-51523

Page: 3

	Rate	Hours	
Consolidation.	375.00	0.50	187.50
For Legal Services Rendered		29.60	11,687.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	4.70	\$500.00	\$2,350.00
W. Drew Mallender	24.90	375.00	9,337.50

Advances

01/06/2025	B110	E108	Postage - Mailout of 8th fee App - Blend Document Technologies #59263B	1,351.87
02/04/2025	B110	E123	Professional fees - 3rd Fee App - Greg T. Murray PLLC #13184	2,062.50
03/31/2025	B110	E108	Postage - Mailout of 9019 (#342) - Blend Document Technologies #59477B	1,656.21
			Total Advances	5,070.58
			Total Current Work	16,758.08
			Previous Balance	\$26,732.68
			<b>Balance Due</b>	<b><u>\$43,490.76</u></b>

Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
16,758.08	0.00	0.00	0.00	0.00	26,732.68

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	5070.58
B160	Fee/Employment Applications	4350.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	7337.50	0.00
B100	Administration	11,687.50	5,070.58

Invoices are payable upon receipt.

To make a payment online, please visit <https://www.pulmanlaw.com>

# **EXHIBIT D-2**



**PULMAN LEFLORE PULLEN & REED LLP**

Attorneys &amp; Counselors

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Lowe, Pat (dppt)  
 Pat Lowe, Trustee  
 2402 E. Main St.  
 Uvalde, TX 78801

April 30, 2025

Invoice No. 267824  
 Account No. 1934.002

Page: 1

(deeproot funds) SEC v. Robert J. Mueller, Deeproot Funds, L

Interim Statement

Fees

					Rate	Hours	
12/12/2024	LSH	B190	A103	Draft opposition to motion to stay and legal research regarding same.	450.00	3.50	1,575.00
	RAP	B190	A104	Office conference with L. Hyman and K. Alleyne regarding response to Motion to Abate SEC case; review and edit of draft response; final review and approval for filing.	500.00	1.50	750.00
				For Legal Services Rendered		5.00	2,325.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.50	\$500.00	\$750.00
Leslie Hyman	3.50	450.00	1,575.00

Total Current Work	2,325.00
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<b>Balance Due</b>	<b><u>\$2,325.00</u></b>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	2325.00	0.00
B100	Administration	2,325.00	0.00

Lowe, Pat (dprt)

Statement No. 267824

Account No 1934.002

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(deeproot funds) SEC v. Robert J. Mueller, Deeproot

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**EXHIBIT D-3**  
**to**  
**EXHIBIT D-25**  
**No fees or expenses**

# **EXHIBIT D-26**

**PULMAN LEFLORE PULLEN & REED LLP**

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April 30, 2025

Invoice No. 267825  
 Account No. 1934.026

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Claims against Mark Zabinski - Finder

Interim Statement

Fees

					Rate	Hours	
12/02/2024	AKM B190	A101	Appear for and attend status conference.		275.00	0.20	55.00
	RAP B190	A109	Appear for/attend - status conference.		500.00	0.75	375.00
12/12/2024	AKM B190	A101	Prepare draft agreed scheduling order; research local rules regarding same.		275.00	1.00	275.00
12/16/2024	AKM B190	A101	Review of scheduling order; emails to/from Mike Colvard approving same.		275.00	0.80	220.00
12/17/2024	AKM B190	A101	Emails to/from Mike Colvard regarding scheduling order.		275.00	0.30	82.50
01/09/2025	AKM B190	A101	Email to opposing counsel regarding deposition dates.		275.00	0.20	55.00
	AKM B190	A101	Finalize and e-serve discovery requests.		275.00	0.50	137.50
	RAP B190	A108	Office conference with A. MacFarlane regarding status; review of document requests; approval of same.		500.00	0.50	250.00
01/13/2025	AKM B190	A101	Attention to emails regarding Zabinski deposition.		275.00	0.30	82.50
	RAP B190	A108	Review of e-mail regarding depositions.		500.00	0.20	100.00
01/16/2025	AKM B190	A101	Emails to/from Randall A. Pulman and opposing counsel regarding disclosures.		275.00	0.50	137.50
	AKM B190	A101	Attention to emails regarding scheduling order.		275.00	0.50	137.50

Lowe, Pat (dprt)

Statement No. 267825  
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Claims against Mark Zabinski - Finder

				Rate	Hours	
01/30/2025	WDM B190	A104	Review pleadings and initial disclosures.	375.00	0.80	300.00
02/04/2025	WDM B190	A104	Review/analyze discovery requests and pleadings; confer with Randall A. Pulman regarding scheduling deposition of defendant.	375.00	0.80	300.00
02/10/2025	RAP B190	A104	Review of discovery responses; office conference with D. Mallender regarding same.	500.00	0.30	150.00
	WDM B190	A105	Office conference with Randall A. Pulman regarding discovery responses	375.00	0.20	75.00
02/11/2025	WDM B190	A104	Prepare email correspondence to opposing counsel regarding scheduling deposition.	375.00	0.20	75.00
02/12/2025	RAP B190	A108	Review of financial statement and tax returns; e-mail to opposing counsel regarding same.	500.00	0.50	250.00
02/20/2025	WDM B190	A103	Review pleadings to determine if amended or supplemental pleadings required. Draft objections and response to interrogatories.	375.00	2.40	900.00
02/21/2025	RAP B190	A104	Office conference with D. Mallender regarding status and Motion for Summary Judgment; schedule depositions.	500.00	0.20	100.00
	WDM B190	A103	Office meeting with Randall A. Pulman regarding drafting motion for partial summary judgement. Review and analysis of pleadings. Draft motion for partial summary judgement.	375.00	3.70	1,387.50
02/24/2025	WDM B190	A103	Draft motion for partial summary judgment. Schedule deposition of Mr. Zabinski, Trustee, and Greg Murray. Review settlement proposal and email to Trustee.	375.00	2.80	1,050.00
	RAP B190	A108	Review and approve deposition notice.	500.00	0.20	100.00
02/25/2025	WDM B190	A103	Correspondence with opposing counsel			

Lowe, Pat (dprt)

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Claims against Mark Zabinski - Finder

				Rate	Hours	
			regarding proposed settlement offer. Draft/edit motion for partial summary judgement.	375.00	5.40	2,025.00
	RAP B190	A108	Office conference with D. Mallender regarding settlement offers.	500.00	0.20	100.00
02/26/2025	WDM B190	A103	Draft/revise response to RFPs and Interrogatories. Draft motion for partial summary judgement. Tel with opposing counsel regarding Mr. Zabinski's settlement proposal	375.00	5.30	1,987.50
02/27/2025	WDM B190	A107	Communicate (other outside counsel) regarding Trustee's counteroffer in settlement. Tel with Pat Lowe regarding same.	375.00	0.60	225.00
02/28/2025	WDM B190	A107	Review Zabinski's counteroffer in settlement. Confer with Pat Lowe. Prepare counter offer. Correspondence with opposing counsel regarding settlement.	375.00	0.80	300.00
	WDM B190	A104	Review client files for documents responsive to Defendant's RFPs.	375.00	1.30	487.50
03/03/2025	WDM B190	A107	Review Defendant's counteroffer in settlement. Confer with Randall A. Pulman regarding same. Prepare Trustee's counteroffer in settlement. Email correspondence with opposing counsel regarding settlement.	375.00	0.60	225.00
	WDM B190	A103	Draft/edit responses to Defendants first set of interrogatories.	375.00	4.20	1,575.00
	RAP B190	A104	Review of settlement offers and counter-offers; office conference with D. Mallender regarding same.	500.00	0.50	250.00
03/04/2025	WDM B190	A103	Draft/revise answers to to interrogatories. Respond to requests for production of documents.	375.00	5.40	2,025.00
	WDM B190	A103	Review defendant's most recent settlement offer. Confer with Randall A.			

Lowe, Pat (dprt)

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Claims against Mark Zabinski - Finder

				Rate	Hours	
			Pulman. Confer with Pat Lowe. Prepare counteroffer. Email correspondence with opposing counsel.	375.00	0.60	225.00
03/05/2025	WDM B190	A103	Continue drafting responses to interrogatories and requests for production of documents.	375.00	2.20	825.00
	WDM B190	A103	Draft/revise Settlement Agreement and Agreed Judgment.	375.00	2.50	937.50
	WDM B190	A103	Draft/revise 9019 Motion and proposed order.	375.00	2.00	750.00
03/06/2025	WDM B190	A103	Office conference with Randall A. Pulman. Draft/revise settlement agreement and order per Randall A. Pulman comments.	375.00	2.60	975.00
	RAP B190	A104	Office conference with D. Mallender regarding terms of settlement accepted by Zabiniski; review and edit of settlement agreement.	500.00	0.50	250.00
03/07/2025	WDM B190	A103	Draft/revise Settlement Agreement, 9019 Motion, and proposed order. Email correspondence with opposing counsel regarding settlement payment. Office conference with Randall A. Pulman regarding same.	375.00	1.50	562.50
03/10/2025	WDM B190	A103	Edits to Settlement Agreement and proposed order. Email correspondence with opposing counsel regarding withdrawal/abatement of discovery requests and depositions.	375.00	1.40	525.00
	RAP B190	A104	Receipt of wire transfer from Zabinski for settlement; office conference with D. Mallender regarding same.	500.00	0.30	150.00
03/13/2025	WDM B190	A103	Draft/revise Rule 9019 Motion and proposed order; email to opposing counsel; confer with Randall A. Pulman regarding same.	375.00	1.60	600.00



Lowe, Pat (dprt)

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Claims against Mark Zabinski - Finder

				Rate	Hours	
03/17/2025	WDM B190	A104	Review/analyze and respond to comments from opposing counsel regarding settlement agreement and rule 9019 Motion.	375.00	1.50	562.50
03/18/2025	WDM B190	A107	Communicate (other outside counsel) regarding settlement.	375.00	0.20	75.00
03/19/2025	WDM B190	A103	Draft/revise settlement agreement, prepare for execution. Email correspondence with opposing counsel and Trustee regarding execution of documents.	375.00	1.00	375.00
03/24/2025	WDM B120	A103	Compile final execution copies of settlement agreement and exhibits for filing, and prepare rule 9019 motion for filing. Email correspondence with M. Colvard regarding settlement agreement, filing of rule 9019 motion. Email to Trustee regarding same.	375.00	2.00	750.00
03/25/2025	WDM B120	A103	Email correspondence with Trustee regarding comments to rule 9019 motion; revise motion.	375.00	0.50	187.50
04/25/2025	RAP B190	A104	Review of exhibit list for hearing on 9019 Motion; office conference with staff regarding same.	500.00	0.50	250.00
	WDM B190	A103	Prepare witness list for hearing.	375.00	0.20	75.00
04/29/2025	RAP B190	A109	Attend hearing on 9019 settlement motion.	500.00	1.00	500.00
	WDM B190	A103	Review settlement agreement and respond to question from court regarding dismissal of adversary.	375.00	0.20	75.00
			For Legal Services Rendered		64.45	24,445.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	5.65	\$500.00	\$2,825.00
W. Drew Mallender	54.50	375.00	20,437.50

Lowe, Pat (dprt)

Statement No. 267825

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Claims against Mark Zabinski - Finder

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	4.30	275.00	1,182.50

Total Current Work	24,445.00
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<b>Balance Due</b>	<b><u>\$24,445.00</u></b>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B120 Asset Analysis and Recovery	937.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	23507.50	0.00
B100 Administration	24,445.00	0.00

Client Funds

04/29/2025	Beginning Client Funds Balance	\$14,166.67
	Withdrawal from client funds to J. Patrick Lowe, Chapter 7 Trustee	-14,166.67
	Ending Client Funds Balance	<u>\$0.00</u>

Invoices are payable upon receipt.  
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# **EXHIBIT D-27**

**to**

# **EXHIBIT D-60**

**No fees or expenses**

# **EXHIBIT D-61**

**PULMAN LEFLORE PULLEN & REED LLP**

Attorneys &amp; Counselors

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April 30, 2025

Invoice No. 267826  
 Account No. 1934.061

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Claims against Carlile, Patchen &amp; Murphy, LLP

Interim Statement

Fees

					Rate	Hours	
08/28/2024	RAP	B190	A109	Office conference with L. Hyman regarding discovery issues.	500.00	0.20	100.00
12/02/2024	AKM	B190	A101	Appear for and attend status conference.	275.00	0.20	55.00
12/17/2024	LSH	B190	A104	Review/analyze discovery requests from opposing counsel to identify documents to potentially produce.	450.00	1.40	630.00
	LSH	B190	A102	Review correspondence from opposing counsel regarding Ohio statute of repose and legal research regarding same.	450.00	1.00	450.00
01/10/2025	WDM	B190	A104	Review/analyze pleadings, discovery requests and related correspondence. Review responsive documents.	375.00	1.80	675.00
01/17/2025	WDM	B190	A104	Review discovery requests and related correspondence and emails concerning agreed response/production.	375.00	1.50	562.50
01/20/2025	WDM	B190	A104	Review files for documents responsive to production requests.	375.00	3.70	1,387.50
01/21/2025	WDM	B190	A104	Review and analysis of files and compile documents responsive to production requests.	375.00	3.50	1,312.50
01/22/2025	WDM	B190	A104	Review/analyze documents to be			

Lowe, Pat (dprt)

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Claims against Carlile, Patchen & Murphy, LLP

				Rate	Hours	
			produced; privilege review.	375.00	4.90	1,837.50
01/23/2025	WDM B190	A104	Review/analyze documents to be produced.	375.00	0.90	337.50
01/28/2025	WDM B190	A104	Review/analyze opposing counsel's arguments concerning choice of law, Ohio statute of repose. Legal research regarding same.	375.00	2.40	900.00
01/29/2025	WDM B190	A104	Continue legal research. Draft response to opposing counsel's letter regarding Ohio statute of repose	375.00	4.80	1,800.00
01/30/2025	WDM B190	A104	Legal research regarding statute of limitations, discovery rule. Draft/edit letter to opposing counsel	375.00	2.20	825.00
02/04/2025	WDM B190	A104	Confer with L. Hyman regarding document production. Review documents to be produced for privilege, etc.	375.00	0.80	300.00
02/05/2025	WDM B190	A104	Review/analyze documents to be produced per agreement with opposing counsel.	375.00	0.80	300.00
02/20/2025	WDM B190	A103	Review and analysis of documents to be produced per agreement of parties.	375.00	1.60	600.00
03/07/2025	WDM B190	A103	Review and analysis of responsive documents to be produced per informal discovery. Research status of SEC case and Mueller criminal case as relates to abatement of CPM adversary. Prepare memo to Randall A. Pulman	375.00	2.90	1,087.50
03/17/2025	WDM B190	A103	Draft/revise letter to opposing counsel regarding informal discovery.	375.00	0.30	112.50
03/26/2025	WDM B190	A102	Research and review status of Mueller cases in preparation for status conference.	375.00	0.60	225.00
	WDM B190	A102	Legal research concerning lien priority.	375.00	1.80	675.00

Lowe, Pat (dprt)

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Claims against Carlile, Patchen & Murphy, LLP

				Rate	Hours	
03/31/2025	WDM B190	A105	Meet with Randall A. Pulman to discuss status of case.	375.00	0.20	75.00
	RAP B190	A105	Office conference with Drew Mallender regarding status of case.	500.00	0.20	100.00
04/07/2025	RAP B190	A103	Telephone conference with opposing counsel regarding status of conference.	500.00	0.30	150.00
	KA B110	A101	Prepare for and attend hearing on Status Report.	0.00	1.30	0.00
			For Legal Services Rendered		39.30	14,497.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.70	\$500.00	\$350.00
W. Drew Mallender	34.70	375.00	13,012.50
Anna K. MacFarlane	0.20	275.00	55.00
Kerry Alleyne	1.30	0.00	0.00
Leslie Hyman	2.40	450.00	1,080.00

Total Current Work 14,497.50

**Balance Due** \$14,497.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	14497.50	0.00
B100	Administration	14,497.50	0.00

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# **EXHIBIT 62**

**No fees or expenses**



# **EXHIBIT D-63**

**PULMAN LEFLORE PULLEN & REED LLP**

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April 30, 2025

Invoice No. 267827  
 Account No. 1934.063

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Redacted Time

Interim Statement

Fees

					Rate	Hours	
10/06/2022	PE	B110	A103	Prepare motion for Substantive Consolidation	100.00	3.00	300.00
10/10/2022	PE	B110	A103	Continue research prepare Motion for Substantive Consolidation	100.00	2.00	200.00
11/01/2022	PE	B110	A103	continue research and prepare motion on Substantive Consolidation along with a proposed order	100.00	4.00	400.00
	PE	B110	A105	Communicate (in firm) with Randall A. Pulman and W. Drew Mallender regarding Motion on Substantive Consolidation	100.00	0.50	50.00
	PE	B110	A105	Email Randall A. Pulman and W. Drew Mallender Motion on Substantive Consolidation	100.00	0.10	10.00
	PE	B110	A101	prepare proposed order and exhibits-motion for substantive consolidation	100.00	1.00	100.00
	PE	B110	A101	Research on the case laws on substantive consolidation	100.00	3.00	300.00
11/02/2022	WDM	B110	A104	Review and comment on Motion for Substantive Consolidation. Meet with Garauf Mankotia regarding same.	375.00	0.50	187.50
	PE	B110	A101	Confer with W. Drew Mallender for motion on substantive consolidation	100.00	0.30	30.00
	PE	B110	A101	Amend motion for substantive			

					Rate	Hours	
				consolidation along with proposed order	100.00	2.00	200.00
11/03/2022	PE	B110	A101	Continue prepare motion for substantive consolidation along with proposed order	100.00	3.00	300.00
11/04/2022	PE	B110	A101	Continue prepare final draft motion for substantive consolidation along with proposed order	100.00	2.00	200.00
01/11/2023	WDM	B190	A104	Review/analyze legal research concerning substantive consolidation.	375.00	2.80	1,050.00
01/12/2023	WDM	B190	A103	Draft/revise motion for substantive consolidation.	375.00	2.70	1,012.50
01/16/2023	WDM	B190	A103	Draft/revise motion for substantive consolidation.	375.00	4.80	1,800.00
01/17/2023	WDM	B190	A103	Draft/revise motion for substantive consolidation.	375.00	7.50	2,812.50
01/18/2023	WDM	B190	A103	Draft/revise Motion for Substantive Consolidation. Meet with Randall A. Pulman regarding same.	375.00	3.80	1,425.00
	RAP	B190	A105	In office conference w W. Drew Mallender regarding motion to consolidate cases.	500.00	0.20	100.00
01/19/2023	RAP	B110	A108	Review and edit of Motion to Consolidate cases.	500.00	0.80	400.00
	WDM	B190	A103	Draft/revise Motion for Substantive Consolidation.	375.00	2.00	750.00
01/20/2023	WDM	B190	A103	Draft/revise proposed Order granting Motion for Substantive Consolidation. Email Motion and Order to Trustee for review and comment.	375.00	0.60	225.00
01/23/2023	WDM	B190	A103	Draft/revise Motion for Substantive Consolidation and proposed Order.	375.00	3.30	1,237.50
	WDM	B190	A101	Confer with Anna MacFarlane regarding Motion for Substantive Consolidation.	375.00	0.20	75.00

Lowe, Pat (dprt)

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				Rate	Hours	
	AKM B190	A101	Confer with W. Drew Mallender regarding substantive consolidation.	275.00	0.20	55.00
01/24/2023	WDM B190	A103	Draft/revise Motion for substantive consolidation.	375.00	0.40	150.00
	WDM B190	A103	Prepare motion for substantive consolidation and exhibits for filing with Court.	375.00	0.50	187.50
	RAP B190	A104	Review and edit of Motion for Substantive Consolidation; office conference with D. Mallender regarding same.	500.00	0.50	250.00
01/26/2023	PR3 B110	A110	Preparing label matrix for Motion Substantive Consolidation.	110.00	3.90	429.00
01/27/2023	PR3 B110	A110	Preparing label matrix for Motion Substantive Consolidation.	110.00	4.00	440.00
	AKM B190	A101	Internal conference regarding substantive consolidation and complaints.	275.00	0.30	82.50
			For Legal Services Rendered		59.90	14,759.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.50	\$500.00	\$750.00
W. Drew Mallender	29.10	375.00	10,912.50
Anna K. MacFarlane	0.50	275.00	137.50
PARA-3	7.90	110.00	869.00
Prior Employees	20.90	100.00	2,090.00

Total Current Work 14,759.00

**Balance Due** \$14,759.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	3546.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	11212.50	0.00
B100	Administration	14,759.00	0.00

Lowe, Pat (dprt)

Statement No. 267827

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